

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

LEAD EXPRESS, INC., et al.,

Defendants.

Case No. 2:20-cv-00840-JAD-NJK

**STIPULATION AND ORDER
CONTINUING HEARING ON
PRELIMINARY INJUNCTION
AND CONTINUING
TEMPORARY RESTRAINING
ORDER**

ECF No. 30

The FTC and Defendants Lead Express, Inc., Camel Coins, Inc., Sea Mirror, Inc., Naito Corp., Kotobuki Marketing, Inc., Ebisu Marketing, Inc., Hotei Marketing, Inc., and Daikoku Marketing, Inc., Takehisa Naito, and Keishi Ikeda (collectively “Non-Tribal Defendants”), by and through their undersigned counsel, hereby stipulate and agree as follows:

1. The Non-Tribal Defendants seek a continuance of the deadlines set forth in the Temporary Restraining Order entered by this Court on May 19, 2020 (ECF No. 13) (“Temporary Restraining Order”), as amended by the Stipulation and Order Continuing Hearing on Preliminary Injunction entered by this Court on May 22, 2020 (ECF No. 17), and as further modified by the Minute Order entered by this Court on May 29, 2020 (ECF No. 28), for one week.
2. The FTC and Defendant La Posta Tribal Lending Enterprise have reached an agreement on a stipulated preliminary injunction. The FTC and the Non-Tribal Defendants are actively negotiating a separate agreement, and the parties believe an additional week will allow them the opportunity to attempt to resolve remaining issues..
3. Accordingly, the Non-Tribal Defendants shall **SHOW CAUSE** in writing by **June 15, 2020**, why (1) the Temporary Restraining Order should not be converted into a

preliminary injunction; (2) a receiver should not be appointed over the corporate defendants with the duties and authority set forth by the FTC in its emergency motion and proposed order, (3) foreign assets should not be repatriated, and (4) the FTC should not be allowed expedited discovery and access to the defendants' businesses. The FTC shall have until **June 19, 2020**, to file a reply to any response to this show-cause order.

4. The matters at issue in the show-cause order, including the FTC's request for a preliminary injunction, **will be heard via videoconferencing (with no in-person appearances) at 10:00 a.m. on Friday, June 26, 2020.** Details for connecting to that hearing will be distributed in a future order.
5. The Temporary Restraining Order shall continue in full force and effect as to Defendants until after the rescheduled hearing on the order to show cause.
6. This agreement shall be without prejudice to any party.

IT IS SO STIPULATED.

/s/Gregory A. Ashe

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13 *Lending Enterprise*

14 **IT IS SO ORDERED.**

15 
16 JENNIFER A. DORSEY
17 UNITED STATES DISTRICT JUDGE

18 Dated: 6/11/2020